

Electronically Filed November 2, 2021

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Counsel for Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

GYPSUM RESOURCES
MATERIALS, LLC,

- ☐ Affects Gypsum Resources Materials, LLC
☐ Affects Gypsum Resources, LLC
☒ Affects all Debtors

Case No. BK-S-19-14796-mkn

Jointly Administered with
Case No. BK-S-19-14799-mkn

Chapter 11

**NOTICE OF ENTRY OF ORDER
APPROVING FOURTH STIPULATION
TO EXTEND DEADLINES IN
CONNECTION WITH THE ORDER
ESTABLISHING BIDDING
PROCEDURES AND DEADLINES
RELATING TO SALE PROCESS FOR
CERTAIN OF DEBTORS' INDUSTRIAL
REAL PROPERTY AND RESIDENTIAL
REAL PROPERTY ASSETS HEARING
[ECF NO. 1466]**

Old Sale Hearing Date: November 9, 2021
Old Sale Hearing Time: 9:30 a.m.

New Sale Hearing Date: December 13, 2021
New Sale Hearing Time: 9:30 a.m.

PLEASE TAKE NOTICE that on the 2nd day of November, 2021 the Court entered an *Order Approving Fourth Stipulation to Extend Deadlines in Connection with the Order Establishing Bidding Procedures and Deadlines Relating to Sale Process for Certain of Debtors' Industrial Real Property*

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1 *and Residential Real Property Assets Hearing [ECF No. 1466] [ECF No. 1706], a copy of which is*
2 *attached hereto.*

3 **FOX ROTHSCHILD LLP**

4 By: /s/Brett A. Axelrod
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9 *Counsel for Debtors*

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Honorable Mike K. Nakagawa
United States Bankruptcy Judge



Entered on Docket
November 02, 2021

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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

GYPSUM RESOURCES
MATERIALS, LLC,

- ☐ Affects Gypsum Resources Materials, LLC
☐ Affects Gypsum Resources, LLC
☒ Affects all Debtors

Case No. BK-S-19-14796-mkn

Jointly Administered with
Case No. BK-S-19-14799-mkn

Chapter 11

**ORDER APPROVING FOURTH
STIPULATION TO EXTEND DEADLINES
IN CONNECTION
WITH THE ORDER ESTABLISHING
BIDDING PROCEDURES AND
DEADLINES RELATING TO SALE
PROCESS FOR CERTAIN OF DEBTORS'
INDUSTRIAL REAL PROPERTY AND
RESIDENTIAL
REAL PROPERTY ASSETS
HEARING [ECF NO. 1466]**

Old Sale Hearing Date: November 9, 2021
Old Sale Hearing Time: 9:30 A.m.

New Sale Hearing Date: December 13, 2021
New Sale Hearing Time: 9:30 a.m.

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The Court having reviewed and considered the *Fourth Stipulation to Extend Deadlines in Connection with the Order Establishing Bidding Procedures and Deadlines Relating to Sale Process for Certain of Debtors' Industrial Real Property and Residential Real Property Assets Hearing [ECF No. 1466]* [ECF No. 1704] (the "Stipulation"), and good cause appearing;

IT IS HEREBY ORDERED that the Stipulation, a copy of which is attached hereto as **Exhibit A**, is APPROVED.

IT IS FURTHER ORDERED that that the Bid Deadline is extended to November 15, 2021;

IT IS FURTHER ORDERED that that the Auction shall be held on December 1, 2021 at 9:00 a.m. via zoom at the offices of Fox Rothschild, LLP;

IT IS FURTHER ORDERED that the deadline to file objections to the Sale is extended to December 2, 2021 at 5:00 p.m.;

IT IS FURTHER ORDERED that Debtors' deadline to file their reply to any objections to the Sale shall be December 9, 2021 at 5:00 p.m.; and

IT IS FURTHER ORDERED that the Sale Hearing shall be held on December 13, 2021 at 9:30 a.m.

IT IS SO ORDERED.

Prepared and Respectfully submitted by:

FOX ROTHSCHILD LLP

By: Brett A. Axelrod
BRETT A. AXELROD, ESQ.
Nevada Bar No. 5859
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
Counsel for Debtors

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EXHIBIT A

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Electronically Filed November 1, 2021

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

GYPSUM RESOURCES
MATERIALS, LLC,

- ☐ Affects Gypsum Resources Materials, LLC
☐ Affects Gypsum Resources, LLC
☒ Affects all Debtors

Case No. BK-S-19-14796-mkn

Jointly Administered with
Case No. BK-S-19-14799-mkn

Chapter 11

**FOURTH STIPULATION TO EXTEND
DEADLINES IN CONNECTION WITH
THE ORDER ESTABLISHING BIDDING
PROCEDURES AND DEADLINES
RELATING TO SALE PROCESS FOR
CERTAIN OF DEBTORS' INDUSTRIAL
REAL PROPERTY AND RESIDENTIAL
REAL PROPERTY ASSETS
HEARING [ECF NO. 1466]**

Old Sale Hearing Date: November 9, 2021
Old Sale Hearing Time: 9:30 a.m.

New Sale Hearing Date: December 13, 2021
New Sale Hearing Time: 9:30 a.m.

Gypsum Resources Materials, LLC, and Gypsum Resources, LLC (collectively, the "Debtors"), debtors and debtors in possession in the above-captioned jointly administered chapter 11 cases (the "Chapter 11 Cases"), by and through their undersigned counsel, the law firm of Fox Rothschild LLP; the Office of the United States Trustee (the "Trustee"); The Eliot A. Alper Revocable Trust Dated March 22, 1999 ("Alper") by and through its undersigned counsel, the law firm of Lewis

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1 Roca Rothgerber Christie LLP; Casa Lender, LLC (“Casa”) by and through its counsel, the law firm
 2 of Garman Turner Gordon LLC; Cashman Equipment Company (“Cashman”), by and through its
 3 counsel, the law firm of Howard & Howard Attorneys PLLC; and Rep-Clark, LLC, by and through
 4 its counsel Snell & Wilmer, LLP, (“Rep-Clark”, and together with the Trustee, Alper, Casa, Cashman
 5 and the Debtors, the “Parties”), stipulate and agree as follows (the “Stipulation”):

6 RECITALS

7 A. WHEREAS, on July 26, 2019 (the “Petition Date”), Debtors each filed a voluntary
 8 petition under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the
 9 “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Nevada (the “Court”),
 10 commencing the Chapter 11 Cases;

11 B. WHEREAS, on July 1, 2021, Debtors filed a *Motion for Entry of (I) an Order (A)*
 12 *Approving Auction and Sale Format and Bidding Procedures, (B) Approving form Notice to be*
 13 *Provided to Interested Parties; (C) Scheduling a Court Hearing to Consider Approval of the Sale to*
 14 *the Highest or Otherwise Best Bidder; and (II) an Order Authorizing the Sale of the Property Free*
 15 *and Clear of All Claims, Liens and Encumbrances* [Docket No. 1390], as amended on July 12, 2021
 16 [Docket No. 1430] (the “Motion”);

17 C. WHEREAS, on July 23, 2021, the Court entered its *Order Establishing Bidding*
 18 *Procedures and Deadlines Relating to Sale Process for Certain of Debtors’ Industrial Real Property*
 19 *and Residential Real Property Assets hearing* [Docket No. 1466] (the “Procedures Order”);

20 D. WHEREAS, on September 24, 2021 the Parties filed a *Second Stipulation to Extend*
 21 *Deadlines in Connection with the Order Establishing Bidding Procedures and Deadlines Relating to*
 22 *Sale Process for Certain of Debtors’ Industrial Real Property and Residential Real Property Assets*
 23 *Hearing [ECF No. 1466]* [Docket No. 1620]; and the Court entered an Order approving the
 24 Stipulation [Docket No. 1624];

25 E. WHEREAS, the Bid Deadline is November 1, 2021;

26 F. WHEREAS, the Auction is to be held on November 3, 2021 at 9:00 a.m.

27 G. WHEREAS, the date for the Sale Hearing is November 9, 2021 at 9:30 a.m.;

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1 H. WHEREAS, the deadline to file objections to the Sale is November 5, 2021 at 5:00
2 p.m.;

3 I. WHEREAS, the Debtors' deadline to file their reply to any objections to the Sale is
4 November 8, 2020 at 12:00 p.m.;

5 J. WHEREAS, the Parties desire to extend the deadlines set forth in the Procedures
6 Order;

7 NOW, THEREFORE, the Parties hereby stipulate and agree to the following:

8 IT IS STIPULATED AND AGREED that the Bid Deadline is extended to November 15,
9 2021;

10 IT IS FURTHER STIPULATED AND AGREED that the Auction shall be held on December
11 1, 2021 at 9:00 a.m. via zoom at the offices of Fox Rothschild, LLP;

12 IT IS FURTHER STIPULATED AND AGREED that the deadline to file objections to the
13 Sale is extended to December 2, 2021 at 5:00 p.m.;

14 IT IS FURTHER STIPULATED AND AGREED that Debtors' deadline to file its reply to
15 any objections to the Sale shall be December 9, 2021 at 5:00 p.m.; and

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IT IS STIPULATED AND AGREED that the Sale Hearing shall be held December 13, 2021 at 9:30 a.m.

Dated this 1st day of November 2021.

FOX ROTHSCHILD LLP

By: /s/ Brett A. Axelrod
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**OFFICE OF THE UNITED STATES
TRUSTEE**

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